



UDOT Environmental Services

NEPA Assignment Program Quality Assurance/Quality Control Plan

March 2017

v2017.1

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1.0 Introduction

On January 17, 2017, Utah Department of Transportation (UDOT) and the Federal Highway Administration (FHWA) executed the “Memorandum of Understanding (MOU) between the FHWA and UDOT Concerning the State of Utah’s Participation in the Project Delivery Program Pursuant to 23 United States Code (USC) 327.” To meet the requirements of the MOU and to ensure that UDOT is successful in assuming FHWA’s responsibilities under the National Environmental Policy Act (NEPA) and other federal and state environmental laws, UDOT has made changes to its environmental program. UDOT has implemented new policies, expanded existing procedures, and developed new tools to support preparation of its NEPA documents and effective NEPA environmental decision-making.

UDOT’s objective is to continue to effectively and efficiently produce high-quality environmental documents that meet NEPA requirements and FHWA’s standards and policies. Appropriate implementation of these procedures and use of these tools by UDOT environmental staff and consultants will result in project environmental documents that meet federal requirements and maintain a high standard of quality.

UDOT complies with NEPA and all other federal environmental requirements for its projects requiring federal funding or approval. Projects that are entirely state funded and other projects not requiring federal approval comply with Utah state environmental requirements.

UDOT integrates quality assurance (QA) and quality control (QC) considerations into its environmental actions and decisions to achieve compliance with applicable laws, regulations, and standards. UDOT distinguishes between QA and QC processes.

- **QA** is defined as the practice of ensuring that all procedures included in the environmental review and approval process are complete, accurate, and correct. The purpose of QA is to maintain a consistently high-quality product. QA is devoted to preventing problems and achieving the goal of “right the first time.”
- **QC** is the practice of seeking out and correcting errors and omissions in an environmental document or technical report. The purpose of QC is to produce a quality finished product and to document the steps taken prior to final approval. QC is devoted to identifying and correcting problems.

This plan provides an overview of the UDOT Environmental QA/QC Program and the procedures and tools that UDOT environmental staff and local agencies are required to use to meet the requirements of the NEPA Assignment Program for individual projects and at the program level. Appendix A provides a flowchart depicting the process for developing and reviewing environmental documents. The QA/QC processes, procedures, and tools identified in this plan are discussed under the following topics:

- Initial project development
- Draft Environmental Assessment (EA) and Environmental Impact Statement (EIS) development
- Final EA, EIS, and individual Section 4(f) evaluation preparation and approval
- Documented categorical exclusions (CE)
- Public involvement
- Environmental project files
- Self-assessment and performance monitoring

1.1 Reference Documents

- **327 NEPA Assignment MOU**
- **Environmental Process Manual of Instruction (MOI)** provides guidance for the preparation of environmental analysis and documentation for transportation projects.
- **Environmental Document (EA/EIS) Process** outlines the process for developing an environmental document within the [UDOT Project Delivery Network](#).
- **Environmental Document Comment Response Matrix** provides a template for commenting and documenting the comment resolution for environmental document reviews
- **Environmental Project File Management Guidance** details the proper placement of electronic project files and naming conventions for environmental documents

2.0 Project Development

The UDOT EIS/EA development process is depicted in Appendix A and described in the [Environmental Document \(EA/EIS\) Process](#). The QA process that occurs during the tasks outlined in the EA/EIS development process are described in the following sections.

2.1 Initial Project Development (Task 01E)

A. Team Formation

Team formation is a requirement for EA and EIS projects. The primary team for environmental documents will consist of the Region's Project Manager, the Environmental Program Manager, and

other Environmental Services staff as assigned. The Environmental Program Manager serves as the environmental lead for the EA or EIS. The goal of this team is to collaborate, coordinate, and complete the environmental process for a project.

Additional members may be added to the project environmental team at the discretion of the team and based on the needs of the project. Additional team members could include subject-matter experts (SMEs), planners, engineers, local government sponsor representative(s), and consultants. Establishing a knowledgeable team, well-versed in the preparation of environmental documents will help ensure that the QA/QC process is implemented and the process is responsive to stakeholder input.

The UDOT Signatory Official will approve EA and EIS documents prepared under the 327 NEPA Assignment MOU. UDOT has assigned a Signatory Official from outside Environmental Services to ensure independent environmental decisions.

B. Initial Project Setup (Scoping)

As defined in the Environmental Document (EA/EIS) Process and as shown in Appendix A, UDOT's environmental process starts with initial project setup (Task 01E). One of the purposes of this task is to review the existing environmental conditions and project type to determine the class of action (CE, EA, or EIS). The class-of-action determination includes analyzing resources potentially affected. The process varies depending on the classification of the project.

The development process for EAs and EISs is a collaborative process that is the responsibility of the team. Quality assurance is conducted throughout the process through team collaboration, consulting with SMEs, and reviewing environmental geographic information systems (GIS) data for the project area as appropriate. The process also includes identifying project staffing and developing an initial schedule. Once the class-of-action documentation is prepared, it is routed to the Signatory Official for approval and documented in the project file to record QA.

2.2 Notice of Intent (Task 09E)

For EIS projects, prepare a Notice of Intent (NOI) to be published in the Federal Register in accordance with the [MOI](#) and the [Environmental Document EA/EIS Process](#).

The Environmental Program Manager reviews the NOI and forwards the NOI to legal counsel for review prior to publishing. If legal counsel has any comments, the Consultant revises the NOI accordingly. Documentation of the legal review is maintained in the project file.

3.0 Draft EA and EIS Development

QA occurs during preparation of the draft environmental document through collaboration, project meetings, and UDOT review of early drafts of document sections. Evidence of QA includes emails, comment and response matrices, notes of telephone conversations, and meeting notes summarizing collaborative discussions held by the project environmental team as well as between team members, cooperating agencies, participating agencies, local government sponsors, or consultants preparing the draft document. Reviews during this stage may include reviewing specific chapters (for example, purpose and need) before submitting the entire draft document. This evidence of QA is included in the project file.

The team reviews the draft environmental document for consistency with the findings of any necessary technical reports prepared to support the environmental document. Any required technical reports will undergo a QC review by the appropriate SME as assigned by the Environmental Program Manager. The QC review of a technical report will consist of the following:

- Review to confirm that the technical report used the appropriate methodology as described in the MOI and resulted in accurate findings
- Review to ensure that appropriate coordination as described in the MOI has been conducted
- Review to ensure that regulatory requirements have been identified and the applicable standards have been met
- Review for clarity, correct grammar, and internal consistency of information

The reviewer comments and author responses are recorded in a Comment-Response matrix and included in the project file to document the QC review of the technical report.

3.1 Review of the Draft Environmental Document

A. NEPA Review (Task 31E)

NEPA review is a QC step performed by the Environmental Program Manager in collaboration with the Region Project Manager and other Environmental Services staff as assigned. This will include a final QC review of the complete draft environmental document and associated public and agency notifications such as a Notice of Availability (NOA) in the *Federal Register* for a Draft EIS. The flowchart in Appendix A shows the steps in the process (shown in green).

At this stage, the document is submitted for NEPA review with the expectation that it is ready for approval. For NEPA review, the team reviews the draft environmental document for the presence of specific content as outlined in the MOI and required by the 327 NEPA Assignment MOU. The purpose of this review is to determine that the environmental document and all studies and coordination

required up to this point are complete and documented and that the environmental document is ready to move forward to public review.

The Environmental Program Manager uses the Environmental Document Review Tool (Appendix B) to perform QC and ensure that all of the components are included in the environmental document. Once the review is complete, the Environmental Document Review Tool is documented in the project file.

The NEPA review process includes the following elements:

- The team reviews the environmental document for:
 - Thoroughness
 - Accuracy
 - Errors and omissions
 - Internal consistency
 - Consistency between the environmental document and supporting technical reports
- SMEs selected by the team review the environmental document sections that pertain to their area of expertise. An SME reviewer for a section cannot be the section's author.
- Reviewer comments and comment resolutions are documented on a comment and response matrix. Once the review is completed, the Comment and Response Matrix is placed in the project file to document the QC review.

B. Legal Review (Task 33E)

At the discretion of the Director of Environmental Services, Draft EAs and EISs may be sent to the Utah Attorney General and/or an assigned outside legal counsel for review of the entire document or specific issues of concern. If legal counsel is used to conduct a review, they will provide a written statement that the legal review has been completed and all legal comments have been appropriately addressed. The statement documenting completion of the legal review is included in the project file.

3.2 Revise and Release Draft Environmental Document (Task 35E)

A. Approval of the Draft Environmental Document

Following the NEPA review and any legal review, the Environmental Program Manager prepares and signs the Environmental Document QC form (Appendix C), which is provided to the Director of Environmental Services as evidence that the document has successfully completed its QC review and is ready for approval for circulation. The Director of Environmental Services will perform a final document review.

- If the Director of Environmental Services has no additional comments, he or she will sign the Environmental Document QC form to document concurrence that the Draft EA or EIS is ready for circulation.
- If the document is not ready for circulation, the Director of Environmental Services will document the issues that require resolution prior to his or her concurrence signature. His or her comments will be documented in a Comment-Response Matrix. The environmental document will be revised as appropriate and resubmitted to the Director of Environmental Services for approval.

The signed Environmental Document QC form certifies that QC is complete, the document meets all applicable requirements, the public participation required through this stage is complete, all required consultation and coordination through this stage is complete and appropriately documented in the administrative record, and legal review (if appropriate) is complete. This step documents that all required QA/QC to this stage of environmental document development has been completed for the Draft EA or EIS.

B. Approval for Circulation

To document that an EA or EIS has been approved for public circulation, the Director of Environmental Services will sign the document for public circulation on the Environmental Document QC form. The environmental document will then be routed to the project's Region Director for review and signature of the Draft EA or EIS cover page. Any comments the Region Director may have will be documented on a comment-response matrix and resolved with the Director of Environmental Services and the project team as necessary prior to document approval. Following the Region Director's signature, the Director of Environmental Services will provide the document along with the signed Environmental Document QC form to the UDOT Signatory Official. After a review of the Draft EA or EIS and the approved QC form, the UDOT Signatory Official will sign the Draft EA or EIS cover page. Any comments the UDOT Signatory Official may have will be documented on a comment-response matrix and resolved with the Director of Environmental Services and the project team as necessary.

prior to document approval. The Environmental Document QC form and the Draft EA or EIS signature page will be placed in the project file to document approval for circulation.

4.0 Final EA, EIS, and Individual Section 4(f) Evaluation Preparation and Approval

4.1 Review of the Final Environmental Document

A. NEPA Review (Task 45E)

The NEPA review for a final environmental document is similar to the NEPA review for a draft environmental document (Task 31E) except that it also includes a review by the Environmental Program Manager to ensure that each of the following additional elements has been completed:

- All required tasks are complete, including finalization of supporting technical reports and memoranda.
- All required consultation and coordination have been completed and documented.
- All public comments have been appropriately addressed, the environmental document has been modified as necessary, and any updated information has been accurately incorporated into the environmental document.

B. Legal Sufficiency Review [Final EISs and Individual Section 4(f) Evaluations Only] (Task 47E)

A Final EIS is reviewed by the Utah Attorney General's office and/or outside legal counsel for legal sufficiency as the last review step before the Environmental Program Manager certifies that the Final EIS is ready for signature. As identified in the NEPA Assignment application, legal sufficiency review consists of the following steps:

- The Environmental Program Manager submits the preliminary Final EIS or Individual Section 4(f) Evaluation to the Utah Attorney General and/or an assigned outside legal counsel. Final EAs may be submitted for legal sufficiency review at the discretion of the Director of Environmental Services.
- The reviewing attorney prepares and submits to UDOT written comments and/or suggestions to improve the document's legal defensibility (this communication is protected by attorney-client privilege).

- The reviewing attorney will be available to discuss the resolution of his or her comments and/or suggestions.
- Once the reviewing attorney is satisfied that the project team has appropriately addressed his or her comments and/or suggestions, the reviewing attorney provides the Environmental Program Manager with written documentation that the legal sufficiency review is complete.
- Environmental Services will not recommend a Final EIS or Individual Section 4(f) Evaluation for approval before receiving written documentation that the legal sufficiency review is complete.

Once complete, the legal sufficiency determination is included in the project file.

4.2 Revise and Release Final Environmental Document (Task 49E)

This process is the same as for a draft environmental document (Task 35E).

4.3 Environmental Decision (Tasks 51E and 53E)

A project decision for an EA or EIS is made in a collaborative effort among the UDOT Region Project Manager (and other region staff as determined by the Project Manager), the Environmental Program Manager, and the Director of Environmental Services.

- For an EA, the project decision may be the Finding of No Significant Impact (FONSI), a finding of significance, or the decision to revise the project or the environmental document classification.
- For an EIS, the decision document is a Record of Decision (ROD).

The Environmental Program Manager and assigned staff as necessary conduct a QC review of the decision document. Review items at this stage include:

- Decision document
- Public and agency notification documents
- For a Final EIS, final resolution of any public and agency comments
- Resolution of necessary permits and approvals, as required
- Review of the project file for completeness

The QC review of the decision document includes (1) reviewing the decision document for clarity in describing the decision and (2) verifying accuracy and consistency of project information against the final environmental document.

After the QC review is completed, the Environmental Program Manager signs the Environmental Decision Document QC form (Appendix D) to denote that the decision document is ready for

approval and public release. The draft decision document and signed Environmental Decision Document QC form are submitted to the Director of Environmental Services for final review. After any comments are addressed, the Director of Environmental Services signs the Environmental Decision Document QC form. The project decision document will then be provided to the UDOT Signatory Official for final review and approval. The Environmental Decision Document QC form and the decision document signature page will be placed in the project file to document approval.

If a single Final EIS and ROD are being prepared, this step (Task 53E) can be combined with Approval of the Final Environmental Document and Approval for Circulation (Task 49E).

5.0 Documented Categorical Exclusions

The 327 NEPA Assignment MOU does not supersede the existing 326 CE MOU between FHWA and UDOT under which FHWA assigned its responsibilities to UDOT, pursuant to 23 USC 326, for determining whether certain projects qualify for CEs and assigned certain other responsibilities for those projects. The 326 CE MOU was initially executed on July 1, 2008, and has been extended for three-year periods thereafter. The processes and QA/QC procedures for CEs processed under the CE Assignment MOU are unchanged and are described on UDOT's [Categorical Exclusion website](#).

The CE projects excluded under the CE Assignment MOU (referred to as *Documented CEs*) will be assumed by UDOT under the 327 NEPA Assignment MOU.

Section 3.2(B) of the MOI describes the process and procedures that are followed for Documented CEs approved under the 327 NEPA Assignment MOU. For these projects, prior to the CE determination, the Region Environmental Manager, Environmental Program Manager, and Director of Environmental Services review the project environmental file for completeness and verify that all required coordination and studies have been completed, the project meets the criteria for a CE, and the file supports the CE determination. The [Categorical Exclusion Reviewer QC Checklist](#) is completed by the Region Environmental Manager or the Environmental Program Manager and is documented in the project file. The Director of Environmental Services approves Documented CEs.

6.0 Public Involvement (Tasks 05E and 07E)

UDOT implements a public involvement program that encourages and solicits public input and provides the opportunity for stakeholders to become fully involved in the proposed project. UDOT's public involvement program is described in Chapter 4 of the MOI. The procedures described ensure that public involvement is conducted in accordance with the requirements of 23 Code of Federal Regulations (CFR) 771.111 and all other applicable federal and state requirements.

Documentation of public involvement for a project is required. The Environmental Program Manager in collaboration with the Region Communication Manager and the Communications Office is responsible for the QC review of project public involvement documentation for EAs and EISs.

6.1 Public Meeting and Public Hearing Summary and Analysis Reports

Following a public meeting or public hearing, a summary and analysis report of the meeting or hearing is prepared. The Region Environmental Manager or delegate (for a CE) or the Environmental Program Manager (for an EA or EIS) along with the Region Communication Manager conducts a QC review of the summary and analysis report. The QC review of the report includes:

- Ensuring that the events of the public meeting or public hearing are accurately recorded.
- Reviewing UDOT's responses to public comments on the environmental document, as necessary, for consistency, completeness, and appropriateness.
- Confirming that the forms and materials from the public meeting or public hearing are accurately represented in the report.
- Confirming that necessary changes to the project as a result of public comments are carried forward in the project development process (revisions to the environmental document and plans sheets) as deemed appropriate by UDOT.

The summary and analysis report and the comment-response matrices are included in the project file to document the QC review.

7.0 Environmental Project Files (Task 55E)

UDOT maintains project and program administration files pertaining to NEPA Assignment responsibilities. The environmental project file is the repository for all required environmental documentation, including QA/QC activities. It includes documentation of the class-of-action determination, technical reports and memoranda, public involvement plans and reports, correspondence regarding consultation and coordination, the environmental document or CE, and documentation of the review and approval process. Emails that support project decision-making, reflect deliberation, and demonstrate a "hard look" under NEPA are retained as part of the project file. All letters and comments received from governmental agencies, the public, and others relative to UDOT's NEPA Assignment responsibilities are also included in the project file. Any attorney-client privileged documents are kept in a separate file.

UDOT uses its electronic data-management system as the environmental file system of record for NEPA Assignment Program projects. UDOT's Environmental Document File Management guidance outlines the methods for file organization, and file naming conventions.

Environmental project files are maintained in accordance with the record-retention policy outlined in the MOI and Environmental Document (EA/EIS) Process as established by the 327 NEPA Assignment MOU.

8.0 Self-Assessment and Performance Monitoring

8.1 Self-Assessment Program

UDOT conducts self-assessments to determine the effectiveness of its standards, guidance, and procedures under the NEPA Assignment Program and to determine UDOT staff's adherence to and implementation of the NEPA Assignment MOU and to UDOT's established standards and procedures. Performance reviews and self-assessment summary reports are completed and provided to FHWA according to the schedule in the NEPA Assignment MOU.

Self-assessments are used to identify problem areas as well as best practices. Where problems are identified, self-assessments are used to assess whether specific problems are systemic or are confined to specific areas of the state or to individuals, and to identify the causes of problems. UDOT uses the self-assessment process to identify areas that are working well, as well as areas that need improvement; make specific recommendations to improve adherence to standards and procedures; assess the need for corrective action as well as implement necessary corrective actions; evaluate improvements achieved from previous corrective actions; and re-evaluate previous program areas where corrective actions have been implemented.

Self-assessments will be conducted in accordance with the performance metric defined in Appendix E – Performance Measures for the UDOT NEPA Assignment Program. Monitoring tools include reviews of files and the data-management system, distribution of questionnaires, and tracking timelines for various tasks. Interviews of UDOT and resource agency staff may be conducted if additional information is necessary. These self-assessments help gauge the success of the NEPA Assignment Program.

The Director of Environmental Services is responsible for overseeing UDOT's implementation of the NEPA Assignment Program, ensuring its success, and reporting on its performance to FHWA. The Environmental Services Environmental Performance Manager will serve as the liaison to the FHWA Assignment Program audit team.

For self-assessments, the UDOT Environmental Performance Manager will perform reviews or request reviews to be performed by SMEs, document and communicate performance review results, and communicate any identified issues to the Director of Environmental Services.

The Director of Environmental Services and the Environmental Performance Manager will establish corrective actions for Environmental Services, validate that corrective actions have been implemented, validate the effectiveness of implemented corrective actions, and manage a process to ensure continuous improvement.

8.2 Performance Measurement

UDOT monitors a variety of performance measures as part of its self-assessment program to evaluate its performance in assuming NEPA Assignment Program responsibilities (see Appendix E). These measures, as identified in the 327 NEPA Assignment MOU, are:

1. Compliance with NEPA and other federal environmental statutes and regulations:
 - a. Maintain documented compliance with procedures and processes set forth in the MOU for the environmental responsibilities assumed under the Program; and
 - b. Maintain documented compliance with requirements of all applicable federal statutes and regulations for which responsibility is assumed (Section 106 of the National Historic Preservation Act, Section 7 of the Endangered Species Act, etc.).
2. Quality control and quality assurance for NEPA decisions:
 - a. Maintain and apply internal QA/QC measures and processes, including a record of:
 - Legal counsel review of notices that will be published in the *Federal Register*, as well as legal sufficiency reviews and legal sufficiency determinations for environmental impact statements and Section 4(f) regulations in accordance with FHWA regulations;
 - Compliance with FHWA's and UDOT's environmental document content standards and procedures, including those related to QA/QC; and
 - Completeness and adequacy of documentation of project records for projects done under the Program.
3. Monitor relationships with agencies and the general public:
 - a. Assess change in and ensure effective communication among UDOT, Federal and State resource agencies, and the public resulting from assumption of responsibilities under the MOU;
 - b. Maintain effective responsiveness to substantive comments received from the public, agencies, and interest groups on NEPA documents and environmental concerns; and
 - c. Maintain effective NEPA conflict-resolution processes whenever appropriate.

4. Increased efficiency and timeliness in completion of the NEPA process:
 - a. Compare time of completion for NEPA approvals before and after assumption of responsibilities under the MOU.
 - b. Compare time to completion for key interagency consultation formerly requiring FHWA participation (e.g., Section 7 biological opinions, Section 106 resolution of adverse effects) before and after assumption of responsibilities under the MOU.

UDOT NEPA Assignment performance measures, desired outcomes, tools and indicators, and metrics are presented in Appendix E.

9.0 Revision History

Version Number	Date	Revision
2017.1	March 2017	--

10.0 Glossary

Categorical Exclusion (CE) – A CE is prepared for a project that does not individually or cumulatively have a significant environmental effect and meets the definition of a CE in 23 CFR 771.117.

Team – The team consists of the Region Project Manager, the Environmental Program Manager, and other Environmental Services staff as assigned. Team members may expand the project environmental team to include SMEs, planners, engineers, local agency sponsor representatives, and/or consultants. The core team coordinates and facilitates the environmental documentation process.

Environmental Assessment (EA) – An EA is required for a project that does not meet the requirements for a CE and for which the significance of impacts is not known. The purpose of an EA is to determine whether a project will cause significant effects, thereby requiring the preparation of an Environmental Impact Statement (EIS). If the EA concludes that an EIS is required, the information in the EA facilitates the EIS's preparation. If the EA concludes that no significant impacts would occur, a Finding of No Significant Impact (FONSI) is prepared. The EA supports UDOT's decision and documents NEPA compliance.

Environmental Impact Statement (EIS) – An EIS is prepared for a project that would or could have significant social, economic, and/or environmental impacts.

Environmental review process – The process that applies to developing and reviewing all transportation project environmental documents, regardless of whether these documents were prepared or proposed by the State, by local government, or by private entities. In the context of planning and environmental linkage, it mostly pertains to the environmental processes conducted under NEPA or state environmental regulations for transportation projects.

NEPA Assignment – Program authorized by Congress and codified as the Surface Transportation Project Delivery Program at 23 USC 327 that allows FHWA to assign, and States to assume, FHWA's responsibilities for NEPA as well as the consultation and coordination responsibilities under other federal environmental laws. NEPA Assignment occurs through state application and execution of an FHWA/State MOU that defines requirements, roles, and responsibilities.

NEPA review – NEPA review occurs when the environmental document is reviewed for thoroughness, accuracy, errors and omissions, internal consistency, and consistency between the environmental document and supporting technical reports and among the supporting technical reports. NEPA review is performed by the Environmental Program Manager in collaboration with the Region Project Manager and other Environmental Services staff as assigned. Completion of the NEPA review is documented on the Environmental Document QC form.

Quality assurance (QA) – The practice of ensuring that all procedures included in the environmental review and approval process are complete, accurate, and correct. The purpose of QA is to maintain a consistently high-quality product. Quality assurance is devoted to preventing problems and achieving the concept of "right the first time."

Quality control (QC) – The practice of seeking out and correcting errors and omissions in an environmental document or technical report. The purpose of QC is to produce a quality finished product and to document the steps taken prior to final approval. QC is devoted to identifying and correcting problems.

Technical report – Any technical environmental documentation prepared to support the environmental document.

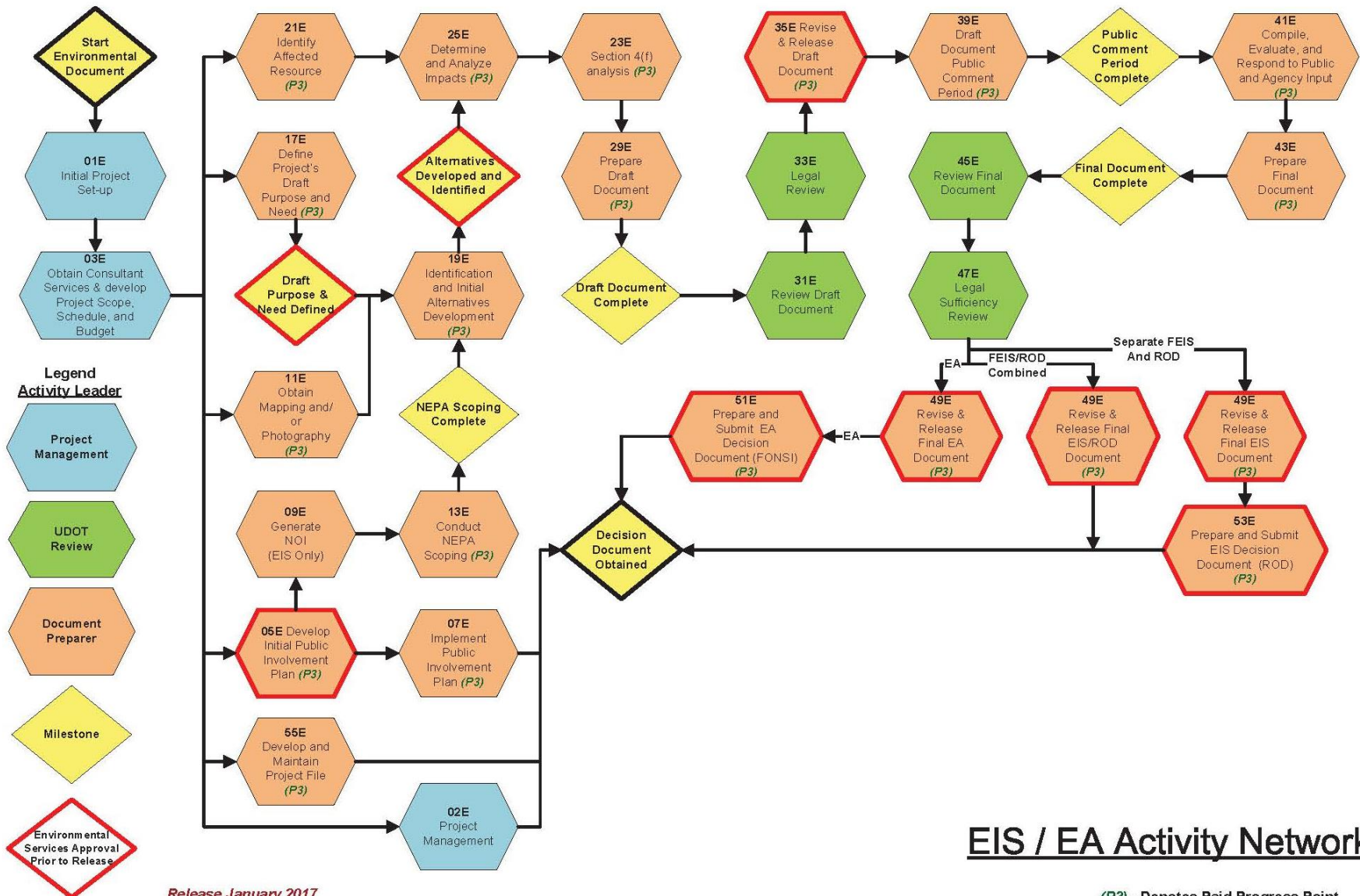
11.0 Abbreviations and Acronyms

EA	Environmental Assessment
EIS	Environmental Impact Statement
CE	Categorical Exclusion
CFR	Code of Federal Regulations
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
GIS	geographic information systems
MOI	UDOT Environmental Process Manual of Instruction
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
NOA	Notice of Availability
NOI	Notice of Intent
PEL	Preliminary Environmental Linkage
QA	quality assurance
QC	quality control
ROD	Record of Decision
SME	subject-matter expert
UDOT	Utah Department of Transportation
USC	United States Code

Appendix A. Environmental Compliance Process Flowchart

NEPA ASSIGNMENT PROGRAM QUALITY ASSURANCE / QUALITY CONTROL PLAN

Appendix A Environmental Compliance Process Flowchart



Appendix B. Environmental Document Review Tool

Environmental Document Review Tool



Project Name:		<input type="checkbox"/> State <input type="checkbox"/> Federal - Assigned <input type="checkbox"/> Federal - Not Assigned	
Project PIN:	Project Number:	Federal No. (if applicable):	
Region:	City:	County:	
Document Type: <input type="checkbox"/> EA <input type="checkbox"/> EIS	Document Stage: <input type="checkbox"/> Draft <input type="checkbox"/> Final <input type="checkbox"/> Supplemental		
Major Required Content			
Content	Included	N/A	Comments
Cover Sheet			
EIS number (assigned by UDOT)	<input type="checkbox"/>	<input type="checkbox"/>	
Name of project to include route, termini, city or county, and state	<input type="checkbox"/>	<input type="checkbox"/>	
Document Type (e.g. Draft Environmental Impact Statement)	<input type="checkbox"/>	<input type="checkbox"/>	
Legal Citations			
23 USC 327 assignment language	<input type="checkbox"/>	<input type="checkbox"/>	
Federal regulation 42 USC 4332(2)(c)	<input type="checkbox"/>	<input type="checkbox"/>	
49 USC 303 for Section 4(f)	<input type="checkbox"/>	<input type="checkbox"/>	
Title of lead agency and any cooperating agencies	<input type="checkbox"/>	<input type="checkbox"/>	
Due date, name, and address for submitting comments	<input type="checkbox"/>	<input type="checkbox"/>	
Signature block and contacts	<input type="checkbox"/>	<input type="checkbox"/>	
Abstract (only required for EIS)	<input type="checkbox"/>	<input type="checkbox"/>	
ROD (for Final EIS)	<input type="checkbox"/>	<input type="checkbox"/>	
Decision	<input type="checkbox"/>	<input type="checkbox"/>	
Alternatives considered	<input type="checkbox"/>	<input type="checkbox"/>	
Summarize basis of any Section 4(f) decisions	<input type="checkbox"/>	<input type="checkbox"/>	
Measures to minimize adverse impacts	<input type="checkbox"/>	<input type="checkbox"/>	
Monitoring or enforcement program	<input type="checkbox"/>	<input type="checkbox"/>	
Substantive comments and responses on the FEIS	<input type="checkbox"/>	<input type="checkbox"/>	
Executive Summary (optional for EA, but required for EIS)			
Brief project description	<input type="checkbox"/>	<input type="checkbox"/>	
Description of major actions proposed by other governmental agencies in same geographic area	<input type="checkbox"/>	<input type="checkbox"/>	
Summary of major conclusions for all reasonable alternatives considered and major environmental impacts (table recommended)	<input type="checkbox"/>	<input type="checkbox"/>	
Any areas of controversy	<input type="checkbox"/>	<input type="checkbox"/>	
Any unresolved issues with other agencies	<input type="checkbox"/>	<input type="checkbox"/>	
List of other federal actions likely to be required for the project	<input type="checkbox"/>	<input type="checkbox"/>	
Statute of Limitations statement	<input type="checkbox"/>	<input type="checkbox"/>	
Table of Contents: include list of tables, figures and appendices	<input type="checkbox"/>	<input type="checkbox"/>	
List of Acronyms	<input type="checkbox"/>	<input type="checkbox"/>	

NEPA ASSIGNMENT PROGRAM QUALITY ASSURANCE / QUALITY CONTROL PLAN

Appendix B Environmental Document Review Tool



Content	Included	N/A	Comments
Proposed Project Location			
Introduction: Brief introduction including appropriate figures	<input type="checkbox"/>	<input type="checkbox"/>	
Existing Facility Description (if necessary)	<input type="checkbox"/>	<input type="checkbox"/>	
Project Description			
Logical termini, independent utility, needs assessment study area	<input type="checkbox"/>	<input type="checkbox"/>	
Includes location, length, type of improvements, ROW / Easements needed	<input type="checkbox"/>	<input type="checkbox"/>	
Purpose and Need			
Purpose statements	<input type="checkbox"/>	<input type="checkbox"/>	
Need statements	<input type="checkbox"/>	<input type="checkbox"/>	
Planning and Programming Status			
Consistent with current Plan and Program (required for Final Environmental Document)	<input type="checkbox"/>	<input type="checkbox"/>	
Reference to plan sheet in appendix	<input type="checkbox"/>	<input type="checkbox"/>	
Alternatives			
Discussion of build alternative(s)	<input type="checkbox"/>	<input type="checkbox"/>	
Estimated cost information	<input type="checkbox"/>	<input type="checkbox"/>	
No-build alternative	<input type="checkbox"/>	<input type="checkbox"/>	
Identification of preferred alternative (required for Final Environmental Document)	<input type="checkbox"/>	<input type="checkbox"/>	
Locally preferred alternative, if one has been identified	<input type="checkbox"/>	<input type="checkbox"/>	
Alternatives considered but eliminated from further consideration	<input type="checkbox"/>	<input type="checkbox"/>	
Comments and Coordination (Public Involvement and Agency Coordination)	<input type="checkbox"/>	<input type="checkbox"/>	
Section 6002 coordination plan	<input type="checkbox"/>	<input type="checkbox"/>	
Scoping process including notices and meetings	<input type="checkbox"/>	<input type="checkbox"/>	
Public participation, including meetings, hearings, and/or workshops	<input type="checkbox"/>	<input type="checkbox"/>	
Consultation and coordination with public agencies	<input type="checkbox"/>	<input type="checkbox"/>	
Responses to substantive comments received on draft environmental document and at public hearings	<input type="checkbox"/>	<input type="checkbox"/>	
Permits and Approvals Needed	<input type="checkbox"/>	<input type="checkbox"/>	
Commitments (table recommended)	<input type="checkbox"/>	<input type="checkbox"/>	
List of Preparers	<input type="checkbox"/>	<input type="checkbox"/>	
Distribution List	<input type="checkbox"/>	<input type="checkbox"/>	
References Cited	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:			

NEPA ASSIGNMENT PROGRAM QUALITY ASSURANCE / QUALITY CONTROL PLAN

Appendix B Environmental Document Review Tool



Affected Environment / Impacts / Avoidance, Minimization and Mitigation Measures			
Verify investigation outcomes and project effects are appropriate for each topic. Verify applicable avoidance, minimization, and mitigation measures for each topic.			
Content	Included	N/A	Comments
Right of way/Displacements	<input type="checkbox"/>	<input type="checkbox"/>	
Land Use	<input type="checkbox"/>	<input type="checkbox"/>	
Consistency with current TIP, RTP, or MTP	<input type="checkbox"/>	<input type="checkbox"/>	
Farmlands	<input type="checkbox"/>	<input type="checkbox"/>	
Community Impacts (Quality of life, recreation, community facilities, community cohesion, public health and safety, ROW/Displacements)	<input type="checkbox"/>	<input type="checkbox"/>	
Environmental Justice	<input type="checkbox"/>	<input type="checkbox"/>	
Utilities/Emergency Services			
Traffic and Transportation/Pedestrian and Bicycle Facilities	<input type="checkbox"/>	<input type="checkbox"/>	
Visual/Aesthetics	<input type="checkbox"/>	<input type="checkbox"/>	
Economics			
Historic Resources	<input type="checkbox"/>	<input type="checkbox"/>	
Archeological Resources and Paleontological Resources	<input type="checkbox"/>	<input type="checkbox"/>	
Water Quality			
Floodplain	<input type="checkbox"/>	<input type="checkbox"/>	
Hazardous Materials	<input type="checkbox"/>	<input type="checkbox"/>	
Joint Development (if applicable)	<input type="checkbox"/>	<input type="checkbox"/>	
Air	<input type="checkbox"/>	<input type="checkbox"/>	
FHWA air quality conformity determination (place in appendix)	<input type="checkbox"/>	<input type="checkbox"/>	
Noise	<input type="checkbox"/>	<input type="checkbox"/>	
Ecosystems (Wetland, Wildlife, T&E Species, Natural Communities)	<input type="checkbox"/>	<input type="checkbox"/>	
Relationship between local short-term uses of the human environment and the maintenance and enhancement of long-term productivity (EISs only)	<input type="checkbox"/>	<input type="checkbox"/>	
Any irreversible and irretrievable commitments of resources which would be involved in the proposed action (EISs only)	<input type="checkbox"/>	<input type="checkbox"/>	
Construction Impacts	<input type="checkbox"/>	<input type="checkbox"/>	
Mitigation Summary (EIS Only)	<input type="checkbox"/>	<input type="checkbox"/>	
Indirect Impacts	<input type="checkbox"/>	<input type="checkbox"/>	
Cumulative Impacts	<input type="checkbox"/>	<input type="checkbox"/>	
Section 4(f) / 6(f) – if applicable	<input type="checkbox"/>	<input type="checkbox"/>	
FHWA constructive use determination	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:			

NEPA ASSIGNMENT PROGRAM QUALITY ASSURANCE / QUALITY CONTROL PLAN

Appendix B Environmental Document Review Tool



Supporting Documentation			
<i>The appendices and/or file of record must contain the following items/documents</i>			
Content	Included	N/A	Comments
Exhibits	<input type="checkbox"/>	<input type="checkbox"/>	
Technical Reports: all technical reports have been completed, approved, and are present in the project file with 23 USC 327 assignment language	<input type="checkbox"/>	<input type="checkbox"/>	
Cultural documentation	<input type="checkbox"/>	<input type="checkbox"/>	
Wildlife documentation	<input type="checkbox"/>	<input type="checkbox"/>	
Agency coordination/consultation documentation in appendices and/or file	<input type="checkbox"/>	<input type="checkbox"/>	
Section 4(f) Evaluation, Programmatic Section 4(f) Evaluation, Section 4(f) De Minimis Determination, or Section 6(f) Evaluation	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:			
Document Consistency			
Content	Included	N/A	Comments
Quantitative consistency between technical reports and Environmental Document (traffic, ROWs, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	
Quantitative consistency within Environmental Document	<input type="checkbox"/>	<input type="checkbox"/>	
Map and figure consistency (project limits, street names, key, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	
Referenced documents located in File of Record and/or Appendices	<input type="checkbox"/>	<input type="checkbox"/>	
Acronym identification and consistency	<input type="checkbox"/>	<input type="checkbox"/>	
Exhibits and appendices listed in the Table of Contents are present in the Environmental Document	<input type="checkbox"/>	<input type="checkbox"/>	
Comments:			
Completed By (Name and Title):			Date:

Appendix C. Environmental Document QC Form

UDOT QC/QA Procedures

**Environmental Document QC Form**

Project Name: _____

Project Number: _____ PIN: _____

Document Type: ☐ EA ☐ EIS ☐ Draft ☐ Final ☐ Other _____

Remarks:

This project meets all of the following requirements:

- A. The document has been determined to be administratively complete as required to date.
- B. The required public participation has been completed as required to date.
- C. All consultation and coordination required to-date is complete and appropriately documented.
- D. Legal Review or Legal Sufficiency Review has been completed, as required.

For final environmental documents:

- E. All public and/or agency comments have been appropriately addressed, the environmental document has been modified as necessary, and any updated information has been accurately incorporated into the environmental document.
- F. All required tasks are complete, including finalization of supporting technical reports and memoranda.

QA Completion

By signing below, I verify that the UDOT QC/QA Procedures have been followed and all necessary QC documentation has been submitted. The document is ready for public release.

Name (Print): _____

Company/Organization: _____

Signature: _____

Environmental Lead

Date: _____

Approval

By signing below, I concur that the document is ready for public release.

Signature: _____

Director of Environmental Services

Date: _____

Appendix D. Environmental Decision Document QC Form

UDOT QC/QA Procedures

**Environmental Decision Document QC Form**

Project Name: _____

Project Number: _____ PIN: _____

Document Type: ☐ EA ☐ EIS ☐ Other _____Document Type: ☐ FONSI ☐ Finding of Significance ☐ ROD ☐ Other _____

Remarks:

The decision document has been reviewed for clarity and verified for accuracy and consistency of project information relative to the final environmental document.

This project meets all of the following requirements:

- A. All public and agency notification, consultation, and coordination required for the environmental decision is complete and appropriately documented in the project file. For a Final EIS, this would include final resolution for any public and/or agency comments.
- B. All necessary permits and approvals have been resolved as required to date.
- C. The project file has been reviewed for administrative completeness.

QA Completion

By signing below, I verify that the UDOT QC/QA Procedures have been followed and all necessary QC documentation has been submitted. The document is ready for public release.

Name (Print): _____

Company/Organization: _____

Signature: _____

Environmental Lead

Date: _____

Approval

By signing below, I concur that the document is ready for public release.

Signature: _____

Director of Environmental Services

Date: _____

Appendix E. Performance Measures

Performance Measures for the UDOT NEPA Assignment Program

Italicized statements are from the NEPA Assignment MOU

Performance Measure	Components of Measure	Desired Outcome	Tool or Indicator to Measure Outcome	Metric
A. Compliance with NEPA and other federal environmental statutes and regulations	<i>i. Maintain documented compliance with procedures and processes set forth in the MOU for the environmental responsibilities assumed under the Program.</i>	UDOT performs self-assessments as required by the MOU.	NEPA Self-Assessment Summary report submitted to FHWA.	Percentage of complete NEPA Self Assessment Summary Review reports submitted to FHWA on schedule.
		UDOT implements corrective actions as necessary.	List of corrective actions that result from UDOT's self-assessments and FHWA's audits, as identified in the NEPA Assignment Program Compliance Review report.	Percentage of identified corrective actions that are implemented.
	<i>ii. Maintain documented compliance with requirements of all applicable federal statutes and regulations for which responsibility is assumed (Section 106, Section 7, etc.).</i>	100% of final environmental documents contain evidence of compliance with requirements of Section 7, Section 106, and Section 4(f).	Self-assessment review to determine whether final environmental documents contain evidence of compliance with Section 7, Section 106, and Section 4(f).	Percentage of final environmental documents that contain evidence of compliance with requirements of Section 7, Section 106, and Section 4(f).

Performance Measures for the UDOT NEPA Assignment Program

Italicized statements are from the NEPA Assignment MOU

Performance Measure	Components of Measure	Desired Outcome	Tool or Indicator to Measure Outcome	Metric
B. Quality control and assurance for NEPA decisions	<i>i. Maintain and apply internal quality control and assurance measures and processes including a record of:</i>	100% of notices published in the Federal Register are reviewed by legal counsel.	Legal approval of Federal Register notices pre-dating the publication date.	Percentage of Federal Register notices with legal approval that pre-date the publication date.
	<i>a. Legal counsel review of notices that will be published in the Federal Register, as well as legal sufficiency reviews and legal sufficiency determinations for EISs and Section 4(f) regulations in accordance with FHWA regulations.</i>	100% of Final EISs and individual Section 4(f)s are determined to be legally sufficient.	Legal sufficiency statement in file pre-dating environmental document approval of Final EISs and individual Section 4(f) determinations.	Percentage of Final EISs and individual Section 4(f) determinations with legal sufficiency statement that pre-date environmental document approval.
	<i>b. Compliance with FHWA's and UDOT's environmental document content standards and procedures, including those related to QA/QC.</i>	100% of EAs and EISs have completed Environmental Document QC form file prior to NEPA approval.	Completed Environmental Document QC form.	Percentage of EAs and EISs with completed Environmental Document QC form in file.

Performance Measures for the UDOT NEPA Assignment Program

Italicized statements are from the NEPA Assignment MOU

Performance Measure	Components of Measure	Desired Outcome	Tool or Indicator to Measure Outcome	Metric
	<i>c. Completeness and adequacy of documentation of project records for projects done under the Program.</i>	95% or more of project files are determined to be complete and adequate.	Self-assessment team evaluation of a sample of environmental project files.	Percentage of sampled environmental project files determined to be complete and adequate each self-assessment period.
C. Relationships with agencies and the general public	<i>i. Assess change in communication among UDOT, federal and state resource agencies, and the public resulting from assumption of responsibilities under the MOU.</i>	Communications remain consistent or improve over time.	<i>Agency</i> Annual resource agency poll. <i>Public</i> Change in number of environmental complaints related to UDOT carrying out its NEPA Assignment Program MOU responsibility received at UDOT.	<i>Agency</i> Compare average evaluation ratings for each period and measure the trend year to year. <i>Public</i> Compare number of complaints received year to year.
	<i>ii. Maintain effective responsiveness to substantive comments received from the public, agencies, and interest groups on NEPA documents and environmental concerns.</i>	100% of EA and EIS projects for which a public hearing/meeting is held have a public hearing/meeting summary report prepared prior to NEPA approval.	Completed public hearing/meeting summary report in project file prior to NEPA approval. Completed comment-response matrix.	Percentage of signed final EAs and EISs for which a public hearing/meeting summary report is in file. Percentage of final EAs and EISs that contain a completed comment-response matrix.

Performance Measures for the UDOT NEPA Assignment Program

Italicized statements are from the NEPA Assignment MOU

Performance Measure	Components of Measure	Desired Outcome	Tool or Indicator to Measure Outcome	Metric
	<i>iii. Maintain effective NEPA conflict-resolution processes whenever appropriate.</i>	UDOT implements resource agency conflict-resolution processes, including those at 23 USC 139(h) and 40 CFR 1504, as appropriate, on a timely basis.	Length of time in dispute-resolution process.	Time between date when dispute-resolution process began and date when resolution was reached.
D. Increased efficiency and timeliness in completion of NEPA process	<i>i. Compare time of completion for NEPA approvals before and after assumption of responsibilities under the MOU.</i>	NEPA approvals occur on a timely basis.	Time taken to complete environmental documents under the MOU.	Compare median time to complete environmental documents under the MOU before and after assignment. Documented CEs and EAs measured from the earlier of date of scope approval or date of classification letter to date of environmental determination; EISs measured from NOI to ROD.
	<i>ii. Compare time to completion for key interagency consultation formerly requiring FHWA participation before and after assumption of responsibilities under the MOU.</i>	Agency consultations occur on a timely basis.	Time taken for agency consultation on Section 7 biological opinions and Section 106 Memorandum of Agreements.	Compare median time for agency consultation on Section 7 biological opinions and Section 106 Memorandum of Agreements before and after assignment.